

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

CIVIL ACTION FILE NO. 5:23-cv-00059

CROWN EQUIPMENT CORPORATION, )  
Plaintiff, )  
v. )  
DAVID BRADY, WILLIAM TUCKER, )  
JOSEPH BOGGS, BRAWTUS HOLDING )  
COMPANY, INC. (f/k/a Pneu-Mech )  
Systems Manufacturing, Inc.), )  
BRAWTUS, MANAGEMENT COMPANY, )  
LLC, PNEU-MECH SYSTEMS )  
MANUFACTURING, LLC (K.N.A. Pneu- )  
Mech Dissolution, LLC), )  
PNEU-MECH SYSTEMS )  
MANUFACTURING, INC., UNITED )  
FINISHING SYSTEMS LLC, )  
Defendants, )  
v. )  
JAMES ANDREWS and JERRY )  
TROSTLE, )  
Third-Party Defendants. )

**DEFENDANT JOSEPH BOGGS'**  
**MOTION AND ORDER FOR**  
**EXTENSION OF TIME TO**  
**RESPOND TO PLAINTIFF'S FIRST**  
**SET OF INTERROGATORIES AND**  
**REQUEST FOR PRODUCTION OF**  
**DOCUMENTS**

NOW COMES Defendant, Joseph Boggs ("Defendant"), and hereby moves the Court, pursuant to Rule 6(b) and Rule 26 of the Federal Rules of Civil Procedure, and Local Rule 7.1, for additional time to respond to Plaintiff's First Set of Interrogatories, Requests for Production of Documents, and Request for Admissions, through and including October 3, 2024.

In support of this motion, Defendant shows the Court that the deadline to

respond to the subject discovery, August 31, 2024, has not expired, and undersigned counsel needs additional time to respond to each request. The undersigned has consulted with counsel for Plaintiff with regards to the above referenced extension, and counsel for Plaintiff has consented to Defendant's extension request.

WHEREFORE, Defendant requests that he be granted an extension of time to respond to Plaintiff's First Set of Interrogatories and Requests for Production of Documents, through and including **October 3, 2024**.

This the 16<sup>th</sup> day of August, 2024.

**CRANFILL SUMNER LLP**

/s/ Ryan L. Bostic

Ryan L. Bostic

NC State Bar No. 44982

C. Andrew Dandison

NC State Bar No. 52095

Kayla McDaniel

NC State Bar No. 57995

CRANFILL SUMNER LLP

5535 Currituck Drive Suite 210

Wilmington, NC 28403

Telephone (910) 777-6068

Faxsimile (910) 777-6146

Email: [rboestic@cshlaw.com](mailto:rboestic@cshlaw.com)

[adandison@cshlaw.com](mailto:adandison@cshlaw.com)

[kmcnoldy@cshlaw.com](mailto:kmcnoldy@cshlaw.com)

*Attorneys for Defendant Joseph Boggs*

## CERTIFICATE OF SERVICE

I hereby certify that on the 16<sup>th</sup> day of August, 2024, I electronically filed the foregoing **DEFENDANT JOSEPH BOGGS' MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS** with the Clerk of Court using the CM/ECF system which will send notification of this filing and an electronic copy of same to all counsel of record registered with the CM/ECF system.

<p>Toby K. Henderson Kaitlyn C. Meeks <b>SEBALY SHILLITO + DYER</b> A Legal Professional Association 40 North Main Street 1900 Stratacache Tower Dayton, Ohio 45423 <a href="mailto:thenderson@ssdlaw.com">thenderson@ssdlaw.com</a> <a href="mailto:kmeeks@ssdlaw.com">kmeeks@ssdlaw.com</a> <i>Attorneys for Plaintiff</i> <i>Crown Equipment Corporation</i></p>	<p>Cory B. Patterson Nelson Mullins Riley &amp; Scarborough, LLP 301 South College St., 23rd Floor Charlotte, North Carolina 28202 <a href="mailto:Cory.patterson@nelsonmullins.com">Cory.patterson@nelsonmullins.com</a> <i>Attorney for Plaintiff</i> <i>Crown Equipment Corporation</i></p>
<p>Abbi Harris, Esq. <b>NAMAN HOWELL SMITH &amp; LEE PLLC</b> 400 Austin Avenue, Suite 800 Waco, TX 76701 <a href="mailto:aharris@namanhowell.com">aharris@namanhowell.com</a> <i>Attorney for Defendants</i> <i>David Brady, William Tucker, Brawtus Holding, Inc., Pneu-Mech Dissolution, LLC and Brawtus Management</i></p>	<p>Andrew Connors, Esq. <b>DARKHORSE LAW PLLC</b> 119 Tradewynd Drive, Suite B Lynchburg, VA 24502 <a href="mailto:andrew@darkhorselaw.com">andrew@darkhorselaw.com</a> <i>Attorney for Defendants</i> <i>David Brady, William Tucker, Brawtus Holding, Inc., Pneu-Mech Dissolution, LLC and Brawtus Management</i></p>
<p>John Riordon, Esq. <b>FIDELITY LAW GROUP</b> 8511 Davis Lake Parkway, Suite C6-138 Charlotte, NC 28269 <a href="mailto:j.riordon@theflg.com">j.riordon@theflg.com</a> <i>Attorney for Defendants</i> <i>David Brady, William Tucker, Brawtus Holding, Inc., Pneu-Mech Dissolution, LLC and Brawtus Management</i></p>	<p>Gerald A. Stein, Esq. Jerrod B. Summey, Esq. <b>HEDRICK GARDNER KINCHELOE &amp; GAROFALO LLP</b> 4201 Congress Street, Suite 300 Charlotte, NC 28209 <a href="mailto:astein@hedrickgardner.com">astein@hedrickgardner.com</a> <a href="mailto:jsummey@hedrickgardner.com">jsummey@hedrickgardner.com</a> <i>Attorneys for Defendant</i> <i>Pneu-Mech Systems Manufacturing</i></p>

<p>Bo Caudill, Esq.  Tomi M. Suzuki  VILLMER CAUDILL, PLLC  P.O. Box 18186  Charlotte, NC 28218  <a href="mailto:bocaudill@villmercaudill.com">bocaudill@villmercaudill.com</a>  <a href="mailto:tomisuzuki@villmercaudill.com">tomisuzuki@villmercaudill.com</a>  <i>Attorney for Defendant</i>  <i>United Finishing Systems, LLC</i></p>	<p>Elizabeth Vennum, Esq.  HULL &amp; CHANDLER  1009 East Boulevard  Charlotte, NC 28203  <a href="mailto:lvennum@lawyercarolina.com">lvennum@lawyercarolina.com</a>  <i>Attorney for Third-Party Defendants</i>  <i>Jerry W. Trostle and James R. Andrews</i></p>
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/s/ Ryan L. Bostic  
Ryan L. Bostic  
NC State Bar No. 44982  
C. Andrew Dandison  
NC State Bar No. 52095  
Kayla McDaniel  
NC State Bar No. 57995  
CRANFILL SUMNER LLP  
5535 Currituck Drive Suite 210  
Wilmington, NC 28403  
Telephone (910) 777-6068  
Facsimile (910) 777-6146  
Email: [rbostic@cshlaw.com](mailto:rbostic@cshlaw.com)  
[adandison@cshlaw.com](mailto:adandison@cshlaw.com)  
[kmcnuel@cshlaw.com](mailto:kmcnuel@cshlaw.com)  
*Attorneys for Defendant Joseph Boggs*